

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
KNOXVILLE DIVISION

LEWIS COSBY, on behalf of himself	)	
and all others similarly situated,	)	CLASS ACTION
	)	
Plaintiff,	)	
	)	
v.	)	No. 3:16-cv-00121
	)	
DELOY MILLER, SCOTT M. BORUFF,	)	JURY TRIAL DEMANDED
PAUL W. BOYD, CHARLES M. STIVERS,	)	
DAVID M. HALL, MERRILL A. McPEAK,	)	
JONATHAN S. GROSS, DAVID J. VOYTICKY,	)	
DON A. TURKLESON, GERALD HANNAHS,	)	
MARCEAU N. SCHLUMBERGER, BOB G.	)	
GOWER, JOSEPH T. LEARY, WILLIAM B.	)	
RICHARDSON, CARL E. GIESLER, JR.,	)	
A. HAIG SHERMAN, and KPMG, LLP,	)	
	)	
Defendants.	)	

**UNOPPOSED MOTION FOR EXTENSION OF TIME FOR DEFENDANT KPMG, LLP  
TO ANSWER, MOVE AGAINST, OR OTHERWISE RESPOND TO COMPLAINT**

Defendant KPMG, LLP (“KPMG”) moves this Court for an extension of time to answer, move against, or otherwise respond to Plaintiff’s Complaint. In support of this motion, KPMG states as follows:

1. KPMG was served with the summons and complaint March 31, 2016, making its answer, motion to dismiss, or other response to the Complaint due on April 21, 2016.
2. Once all parties are served, the parties may seek a comprehensive schedule for deadlines set forth under the Private Securities Litigation Reform Act (“PSLRA”), 15 U.S.C. § 78u-4(a)(3)(A)(i), including dates for filing motions for the appointment of lead plaintiff, for said lead counsel to retain counsel, and for an “operative” complaint to be filed consolidating lead plaintiff’s claims with the existing Complaint.

3. Undersigned counsel has contacted Plaintiff's counsel, Gordon Ball, to request an extension to June 1, 2016 to answer or otherwise respond to the Complaint, pending entry of any comprehensive scheduling order. Mr. Ball has stated that he does not oppose the request or this Motion.

4. This is KPMG's first request for an extension of time to respond to Plaintiff's Complaint.

WHEREFORE, for the foregoing reasons, KPMG moves this Court to enter an Order extending the time for it to answer, move against, or otherwise respond to the Complaint to June 1, 2016.

Respectfully submitted,

s/Paul S. Davidson

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### **CERTIFICATE OF SERVICE**

I hereby certify that on April 19, 2016, a copy of the foregoing was filed electronically and served via the Court's CM/ECF system on the following:

Gordon Ball  
Gordon Ball PLLC  
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And via first-class mail upon the following:

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